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PUBLIC HEARING and COMMENT PERIOD
CONCERNING EPA'S PROPOSAL OF A DRAFT OPERATING
PERMIT FOR VEOLIA ENVIRONMENTAL SERVICES

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HELD ON: July 8, 2008

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REPORTER: Sara E. Tipton, CSR
ILLINOIS NO: 084-003397

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1 MS. POPE: We're going to get ready to start
2 the public hearing. Hello again, everybody. My name is
3 Janet Pope, and I'm a Community Involvement Coordinator
4 for the US Environmental Protection Agency. Tonight I
5 will be serving as your hearing officer for tonight's
6 public hearing. We have two other people from the US
7 Environmental Protection Agency here tonight. We have
8 Genevieve Damico, who is an Environmental Engineer with
9 the US EPA. We also have Charlie Hall, who is an
10 environmental engineer also. Everybody is with the US
11 EPA, and we're out of Chicago, Illinois.

12 We are here tonight to share information, to listen
13 to your questions and comments regarding EPA's proposal
14 of a draft-operating permit for the Veolia Environmental
15 Services located in Sauget, Illinois.

16 Tonight's hearing will have three parts. The first
17 part Genevieve Damico will provide an overview of the
18 draft permit. Second, we will take your comments for the
19 record, public comments for the record; and, third, if
20 time allows, we will have an informal question-and-answer
21 period.

22 Now, when you came in, there was a sign-in sheet in
23 the back. I hope everybody signed in. What that does is
24 revises our mailing list, and if there's any information
25 coming up regarding the site, you'll get the information.

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1 So sign in if you want to get information regarding the
2 site.

3 With the exception of the informal
4 question-and-answer period, everything will go on record.

070908a

5 we have a court reporter to my right. She'll be
6 recording this meeting in its entirety with the exception
7 of the informal question-and-answer period.

8 All persons wishing to speak tonight, when you
9 signed in, I hope you checked the Do You Plan to Make
10 Comments, there is a yes-or-no box. If you want to make
11 formal comments, check the yes box. Okay. And then we
12 did have people call in previously and sign in and make
13 an appointment, too, so those people will be called
14 first, and the people that signed in today, you'll be
15 filled in in the slots that we have vacant.

16 Okay. Now, Genevieve I'll have her come up, and
17 she'll give an overview on the draft-operating permit.

18 MS. DAMICO: Good afternoon, everybody. A
19 quick overview of the action that we're talking today.
20 The Veolia Environmental Technical Services from Sauget,
21 Illinois, is a treatment, storage and disposal facility,
22 which accepts offsite waste for further disposal through
23 incineration. Containers and bulk shipments of hazardous
24 and solid wastes are received, analyzed and transferred
25 to temporary storage facilities, processed and

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1 incinerated in one of three combustion units.

2 Veolia is located in an area that is attaining all
3 of the national ambient air-quality standards except for
4 both the eight-hour ozone and particulate matter less
5 than 2.5 micrograms standard.

6 Veolia requires a Title V permit because it is a
7 major source of hazardous air-pollutant emissions subject

070908a

8 to requirements under Section 112 of the Clean Air Act
9 for boilers and hazardous waste combustors.

10 Title V of the Clean Air Act requires, in part, that
11 all major sources subject to standards under Section 112
12 operate in accordance with a permit. Most Title V
13 operating permits are issued by state or local permitting
14 authorities. EPA is issuing this permit because in
15 response to a petition from the Sierra Club and the
16 American Bottom Conservancy, EPA objected to the permit
17 proposed to be issued by the Illinois EPA.

18 Under Title V, when EPA objects to the proposed
19 permit, the state permitting authority has the
20 opportunity to address EPA's concerns, but if EPA's
21 concerns are not addressed in a timely fashion, then EPA
22 becomes responsible for issuing or denying the permit.
23 In this case, Illinois EPA did not respond to EPA's
24 concerns in a timely manner, and on September 29th, 2006,
25 EPA announced its intent to issue or deny Veolia a

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1 federal Title V permit. Veolia submitted its application
2 to EPA on May 2nd, 2007. EPA deemed the application
3 administratively complete on June 13th, 2007.

4 Pursuant to a proposed settlement agreement between
5 EPA and the Sierra Club and the American Bottom
6 Conservancy, EPA intends to complete the public comment
7 process by July 18th, 2008, and issue or deny a final
8 permit by September 12th, 2008.

9 Concurrently with this permitting process, EPA has
10 alleged that Veolia is in noncompliance with the Clean
11 Air Act. Nothing in this permit will shield Veolia from

070908a

12 any enforcement action related to past or ongoing
13 violations that we have alleged.

14 EPA has included a compliance schedule in the draft
15 permit that requires Veolia to test all three combustors,
16 to develop operating parameter limits for emissions of
17 mercury, low-volatile metals and semi-volatile metals as
18 required by the hazardous waste combustion MACT. The
19 draft permit requires that Veolia submit the results of
20 this testing and revised operating parameter limits by
21 September 26, 2008.

22 If Veolia finds -- or I'm sorry -- if EPA finds the
23 revised operating parameter limits acceptable, EPA will
24 reopen the permit to propose incorporating the operating
25 parameter limits developed from the required performance

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1 test into the final permit and solicit public comment on
2 the incorporation of the operating parameter limits into
3 the permit. In addition, the permit may be reopened at a
4 future time to incorporate additional applicable
5 requirements or compliance schedules.

6 MS. POPE: EPA's public participation
7 regulations require EPA to publish a public notice in the
8 local newspaper. The public notice appeared in the East
9 St. Louis Monitor and the Belleville News Democrat, both
10 published on June 5th. In addition, information was
11 mailed to those who attended Illinois EPA public hearing
12 for Veolia and the hearing for Veolia's neighbor,
13 Solutia.

14 Now, we'll begin our public comment period. I will

070908a

15 call the speakers in the order -- not on the sign-up
 16 sheet but on the sign-up sheet mixed in with the calls
 17 that we already had. When your name is called, please
 18 state your name; then spell your last name for the court
 19 reporter. If you have written comments but do not wish
 20 to speak tonight, please give them to me before you leave
 21 tonight. So that everyone who wishes to speak has a
 22 chance to do so, limit your comments to five minutes. If
 23 you cannot finish, I will ask you to please conclude. At
 24 five minutes I will ask you to please conclude your
 25 comments. At that time you will wrap up in the next

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1 minute. Okay. Five minutes I'll ask you to conclude.
 2 You have a minute to finish. Okay. At the six-minute
 3 interval I will ask you to render the floor to the next
 4 speaker. Okay. All right. After everyone has gotten a
 5 chance to speak, you may return and finish your comments,
 6 or you can submit your remaining comments on paper.

7 Now, we will begin our public comment period.
 8 Remember, if you have written comments, give them to me
 9 before you leave today. If not, we'll start with our
 10 first speaker, and I have a cordless here so I can run
 11 around and get you. Livi Isringhausen.

12 MS. ISRINGHAUSEN: Good afternoon. I'm Livi
 13 Isringhausen, I-S-R-I-N-G-H-A-U-S-E-N. I'm the
 14 Environmental Compliance Manager at Washington University
 15 in St. Louis School of Medicine. Washington University
 16 School of Medicine is rated as one of the top five
 17 medical schools in the nation by US News and World
 18 Report. We have a hundred and sixteen year history of

070908a

19 research and education. One of the best things that
20 comes out of the university is our research. We receive
21 grants and contracts in excess of 460 million dollars in
22 research effort for medicine alone.

23 Some notable things that have come out of our
24 research are that we have done extensive research and
25 development in looking for a cure for Alzheimer's

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1 disease. We helped pioneer the use of insulin in the
2 treatment of diabetes. We proposed the practice of
3 taking aspirin to prevent heart attacks. We developed a
4 cure for Hepatitis B, if it was diagnosed early. We
5 found a surgical cure for arterial fibrillation and
6 helped pioneer cochlear implant surgery.

7 As a result of all this research, there are people
8 like myself that work behind the scenes. My department's
9 responsibilities include the disposal of the byproducts
10 of this research. Washington University has chosen to
11 partner with Veolia Environmental Technical Services to
12 accomplish the proper and safe disposal of these
13 byproducts.

14 Veolia provides us outstanding service in disposing
15 of our common materials and anything unusual that may be
16 a result of the research. Their knowledge and expertise
17 is invaluable when you come across the many array of
18 byproducts that we generate at the university. Having
19 Veolia's incineration complex located here in the
20 St. Louis/Metro area allows for us, many other industries
21 and institutions to reduce our carbon footprint by

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minimizing fuel for transport.

23 In conclusion, Veolia has become an integral part of
24 Washington University School of Medicine's research by
25 providing us many services.

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1 MS. POPE: Next speaker, Dee Reed. Next
2 speaker I'm going to say Dee Reed is not in attendance
3 right now. Put that on the record. George R.
4 Schillinger.

5 MR. SCHILLINGER: My name is George
6 Schillinger, S-C-H-I-L-L-I-N-G-E-R. I'm the Executive
7 Director of the American Bottoms Treatment Plant in
8 Sauget, Illinois. American Bottoms is -- we operate two
9 plants, physical chemical waste water plant owned by the
10 Village of Sauget and the regional plant, the American
11 Bottoms plant, which services: East St. Louis, Cahokia,
12 Alorton, Centreville and a little part of Stookey
13 Township, hence, the Village of Sauget.

14 American Bottoms is immediately east of the Veolia
15 site and just west of the center ethanol site on Highway
16 3. You've probably seen it by now.

17 A little bit on my background. I have a master of
18 science degree in environmental sanitation engineering.
19 I've done additional course work recently working towards
20 a doctorate. Don't have. I teach the capsule and design
21 engineering class for the environmental engineering
22 program for the students at Washington University. Since
23 college, I've worked exclusively in the environmental
24 field. I'm a registered professional engineer in
25 Illinois. I'm a reserve officer in the US Public Health

070908a

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1 service with the equivalent rank of a Navy commander.
2 I'm a board certified environmental engineer.

3 Regarding Veolia, as I said, they are our next-door
4 neighbor. I've toured their facilities on several
5 occasions and daily have an opportunity to observe the
6 operation of this plant. It's always neat, clean, well-
7 maintained, odor free, and there are no visible signs of
8 air emissions. The facility is secure.

9 From the water standpoint or waste-water standpoint,
10 which we enforce on, they are in perfect compliance with
11 our pretreatment program over the years. My compliance
12 staff works with Veolia staff and consider them well-
13 qualified, very qualified and committed to operating in
14 compliance with all environmental regulations and
15 statutes.

16 Veolia is also an active participant in the
17 community. I'm aware that they provide educational tours
18 to local school children and between a -- jointly with
19 American Bottoms and Veolia, we participate in providing
20 educational programs to the interns in the Illinois
21 Governor's Environmental Corps. This has been a very
22 successful program to try to train and to encourage
23 college students to enter this field.

24 As a knowledgeable and professional environmental
25 engineer, I'm aware of the nature of the work at Veolia

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070908a

1 and their facilities and the procedures for controlling
 2 air emissions and the necessary nature of this work. I
 3 am personally quite comfortable occupying an office
 4 within five hundred feet of their facilities and have
 5 done so for the past twenty-three years.

6 As the executive director of the American Bottoms, I
 7 believe our employees and contractors are not exposed to
 8 any risk due to the Veolia's operation. I'd like to
 9 point out that about fifty percent of the American
 10 Bottoms customers, which is in the East St. Louis,
 11 Alorton, Centreville, Cahokia area are below -- have
 12 income levels below the poverty line. You know, many
 13 people would argue that this is an environmental trust
 14 decision and -- and it is. And it's this way, these are
 15 necessary services. In the past three years, American
 16 Bottoms has had to raise its rates to all of our
 17 customers, including these impov -- and those people
 18 below the poverty line, from \$1.74 per thousand gallons
 19 of water discharge to \$4.95, and that's come about
 20 because of the loss of two major industries, Elementis in
 21 East St. Louis that shut down and went to China and Big
 22 River Zinc in Sauget. And that's just a substantial
 23 burden --

24 MS. POPE: Conclude.

25 MR. SCHILLINGER: I have one more minute.

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1 That's transferred to the people who live in this
 2 community.

3 I know I'll finish up with saying Veolia has been an
 4 excellent neighbor, and I have no fear of working right

070908a

5 next door to it. Thank you.

6 MS. POPE: Next speaker, Craig Doolittle.

7 MR. DOOLITTLE: Good afternoon. My name is
8 Craig Doolittle, D-O-O-L-I-T-T-L-E, and I have been asked
9 to speak today on behalf of the Veolia ES Technical
10 Services in Sauget in regard to the issuance of their
11 Title V permit.

12 First my background. I am a licensed professional
13 engineer with over thirty years of experience in the
14 environmental field. I have worked in the hazardous-
15 waste areas since 1980 when the EPA first promulgated the
16 federal hazardous waste regulations under the Resource
17 Conservation and Recovery Act.

18 In 1983, I started working in the hazardous-waste
19 combustion area. First as a permit engineer for a large
20 rotary kiln combustion facility in region five and then
21 as the operations manager for that facility where I was
22 responsible for day-to-day operations and compliance.

23 In the early '90's I took a national-level position
24 working with EPA and other stakeholders on the
25 development of more recent combustion regulations under

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1 the Clean Air Act, the hazardous waste combustion MACT
2 regs, and for the last ten years I worked for ENSR,
3 E-N-S-R, an environmental engineering and consulting firm
4 where I have designed, written and managed dozens of
5 performance tests under what is known as the Hazardous
6 Waste Combustion MACT Regulations and assisted clients
7 comply with the other provisions of those regulations as

070908a

8 well.

9 By way of background for ENSR, ENSR is a 2000
10 employee global environmental health and safety
11 engineering firm with an air-quality practice here in the
12 US with over a hundred full-time air professionals. I
13 currently manage ENSR's air source testing department and
14 their combustion services practice. In addition to stack
15 testing, ENSR provides: Permitting, auditing, dispersion
16 modeling, risk assessment and process engineering
17 services to clients with combustion facilities
18 nationwide. Over the years, we have worked at a number
19 of facilities here at EPA Region V, and we continue to do
20 so today.

21 Since 2001, I have helped design and manage ten
22 different performance test programs to assist Veolia with
23 their efforts to develop sound compliance and operational
24 strategies to comply with the HWC MACT regulations. In
25 addition, our source testing department has been

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1 performing the annual relative accuracy testing for the
2 facility's stack-analyzer systems for the last several
3 years as well. Our source testing staff are all OSHA
4 HAZWOPER trained and generally have experience levels
5 ranging from 10 to 35 years of experience in source
6 testing, itself. They are thoroughly familiar with all
7 EPA promulgated test methods, many of EPA's test methods
8 and the alternative methods that are published on EPA's
9 test method site. ENSR has been in the source-testing
10 business for over three decades, and the quality of our
11 work must be able to be validated through our own

070908a

12 internal quality assurance, quality-control systems,
13 through EPA method specific QA/QC requirements, by
14 independent regulatory agency review and often by third-
15 party reviewers. Our work must be performed to the
16 highest standards.

17 In addition, as a professional engineer, I am also
18 held to a high standard, so when I sign my name to a test
19 report, I must have confidence that that work product is
20 of high quality. The work we have done for Veolia is no
21 exception. We have performed all work in accordance with
22 EPA methods, using properly calibrated equipment, all
23 test results were reviewed for accuracy and to assure
24 that they met the required parameters for valid testing
25 and the lab results were also reviewed to make sure that

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1 all QA/QC metrics were met as well. Veolia has made a
2 significant commitment to understand the performance of
3 their units at Sauget, and I am fully confident that the
4 test results show their compliance with the applicable
5 HWC MACT standards.

6 Finally, in my experience having worked with many
7 different facilities over the years, the Sauget facility
8 represents one of the top performers in the industry.
9 Thank you very much.

10 MS. POPE: The next speaker will be Rich
11 Sauget, Junior.

12 MR. SAUGET: Hello my name is Rich Sauget,
13 Junior, S-A-U-G-E-T. My resume starts as a resident of
14 the Village of Sauget. I'm also the president of the

070908a

15 Board of Trustees for the Village of Sauget. I'm also
 16 the President of the School District Board, School
 17 District 187, which serves: Cahokia, Sauget, Alorton --
 18 parts of Alorton -- and Centreville. And I'm also the
 19 chairman of the Work Enforcement Investment Board, which
 20 is the five county arm of St. Clair County that looks
 21 over all work-force issues in this area. And that's
 22 where I'm going to basically start my discussion.

23 The area that we -- that we're in right now in the
 24 village of Sauget is part of, you know, a regional area,
 25 and the greater area of Southwestern Illinois is doing

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1 quite well in certain aspects, but the area that Sauget
 2 isn't necessarily doing so well we have high
 3 unemployment. We have quite a few people that are under
 4 the poverty line, and we have, although a cluster of
 5 industry within my village, as well as my neighbors in
 6 Cahokia and East St. Louis and Centreville, that have had
 7 some tough times but are still striving to do well.

8 with Veolia and the amount of jobs that they provide
 9 and the community partner that they have shown themselves
 10 to be is very vital to our economic future for the -- as
 11 far as the village is concerned but also for the people
 12 that live in that village.

13 And so we've -- like I said, we've had a few bumps
 14 in the roads with a couple of businesses that have had
 15 some struggles, but we have survived by working together,
 16 and with our industrial community and with American
 17 Bottoms, we've been able to forge through it. So to be
 18 able to have the opportunity to keep those jobs in the

070908a

19 area is vital.

20 From the school board standpoint, we have an ever-
21 shrinking economic base, which is based upon the property
22 assessment. We've had a couple bumps there, too. A few
23 businesses have left. We have an ever-declining
24 assessment. In working with Veolia, they have, I would
25 say, done their part in the bargain, as far as keep their

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1 assessments where they need to. They've always been
2 willing to work with the village and the county to make
3 sure that they're always up to date and to make sure that
4 they're paying their fair share. They also are working
5 with the school district, as far as working with the
6 children, helping with labs, keeping equipment up to date
7 or working with that equipment and working in the -- in
8 the labs to make sure that they're up to snuff.

9 They are also working with Archview Economic
10 Development Corporation, which is a corporation that is
11 made of its members, which are industrial folks, business
12 folks in the -- basically the Alorton -- basically, the
13 school district, Centreville Township, and Veolia has
14 been a founding member. They've worked very, very
15 closely with the school district for the career day,
16 which brings in four to five hundred juniors and seniors
17 every year working at GCS Stadium to allow the youth of
18 our community to know what opportunities they have in
19 their area, places that they drive by that they, you
20 know, two years ago they had no idea it was even a place
21 where you could get a job.

070908a

22 So I see the -- Veolia as a very good partner with
23 the school district. And, finally, talking about the
24 village of Sauget, it is a very delicately-balanced
25 community, as far as its industrial, heavy industrial in

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1 part, as well as light industrial in others. If any of
2 those parties, you know, leave the table, it makes things
3 difficult.

4 We have a nice mix with our American Bottoms. We're
5 still trying to grow our declining base, which has seen
6 some tough times. At one time we were a very small
7 community with a very strong tax base; that is not the
8 case anymore, no matter what people may say. We are not
9 what we once were, but Veolia is keeping us where we are
10 and giving us the opportunities where we have a little
11 new growth.

12 We're working toward greener type energy. We opened
13 a green corridor along Route 3, and the new ethanol plant
14 and some of the things that Veolia is doing is allowing
15 us to have that opportunity. In working with Veolia,
16 I've been very, very satisfied with their openness, as
17 far as their books, to be able to make sure that they are
18 keeping their negotiations fair, as far as assessment.

19 I drive by their facility on a weekly basis, if not
20 daily, and I think that they keep it up. I have toured
21 the facility many, many times. I'm very, very
22 comfortable with them in our community, and I know in
23 talking with our residents within my community they see
24 them as a partner --

25 MS. POPE: Conclude.
 Page 16

070908a

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1 MR. SAUGET: -- not as a foe or an adversary
2 but, like I said, we're very, very comfortable having
3 them in our community. Let me check my notes. I touched
4 on our green corridor and the growth of the village has
5 been successful here in the last three or four years, and
6 I think Veolia is a very strong part of that. There's
7 been some revitalizations and taking over some brown
8 fields and putting them back into -- back into our tax
9 base.

10 We are hoping that Veolia can continue to thrive and
11 join in with the rebirth that the village has had to be
12 able to use some of their excess property, hopefully,
13 which was actually given to the -- to Veolia in its early
14 stages from the village at one time. So it's been a long
15 partnership, and we hope to continue that partnership.
16 Thank you.

17 MS. POPE: Did Dee Reed ever show up?

18 MS. DAMICO: No.

19 MS. POPE: We have a space here at this time if
20 anybody -- did anybody else sign up to make comments that
21 is here now?

22 MS. DAMICO: Robert Schreiber.

23 MR. SCHREIBER: S-C-H-R-E-I-B-E-R. My name is
24 Bob Schreiber. I'm president of Schreiber, Yonley
25 Associates. It's an office located in St. Louis County,

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070908a

1 Missouri. Schreiber, Yonley Associates has been retained
2 by Veolia to comment on its US EPA draft Title V permit
3 and to ensure it meets all the requirements outlined in
4 the federal and state laws. We are specialists in
5 combustion of hazardous waste and have worked on many
6 air-hazardous waste permits through the United States.
7 I'm also a professional engineer in Illinois and Missouri
8 and 34 other states throughout the nation.

9 A little bit of my background, I have a BS in
10 chemical engineering from the University of Missouri in
11 Columbia in 1972. After that, I worked with the Illinois
12 EPA in the Air Permitting Section from 1972 through '74.
13 I have a long history in air permits. I then moved to
14 the Missouri Department of Natural Resources where I was
15 an inspection engineer in 1974, and then I moved up to
16 where I was director of the State's Air Program in 1978
17 and held that position until 1980. In 1980, I was the
18 Director of Programs for the State of Missouri, and I did
19 that from 1980 to 1985, so I covered both air and
20 hazardous waste during that time period.

21 In 1985, I left state government and formed
22 Schreiber, Yonley and Associates and continue to do
23 environmental engineering. As a personal note, I'm a
24 native of Granite City, Illinois, so I have some
25 familiarity with this area. My father was raised in East

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1 St. Louis, and my grandparents lived there until the
2 early '70's before they passed away.

3 The reason I bring that up I do remember back in the
4 '50's and '60's going to visit them from Granite City to

070908a

5 East St. Louis, Illinois, and sometimes going on to
6 Cahokia, Illinois. And during that trip, you would pass
7 the coke oven where it was black. You would pass a steel
8 mill where it was red. You would pass a big hundred acre
9 open burning dump where the current Speedway currently
10 lies where you had to turn your lights on during the day
11 just to be able to see down the road. You then went past
12 a packing plant that had a rendering plant that really
13 smelled very good and then you -- in East St. Louis.

14 If you decided to go from East St. Louis to Cahokia
15 and went through Sauget, it had a high density of
16 chemical plants that also had very strong odors. During
17 that time period, you very seldom saw a blue sky. It
18 just did not exist. And the air was so thick you could
19 cut it with a knife; and, quite frankly, the situation
20 has improved tremendously since that time period.

21 Back in about 1980, Trade Waste Incineration was
22 started to do hazardous-waste incineration. Prior to
23 that, there really wasn't anyplace for hazardous waste to
24 go, other than the open burn or put into a landfill. And
25 even though East St. Louis does not currently meet the

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1 current air-quality standards, the situation has improved
2 tremendously here since the '50's and '60's up until now,
3 and a large part of that is due to activities that have
4 been done with the Clean Air Act passage, the work that's
5 been done by the US EPA and also the work that's been
6 done by the Illinois EPA and in taking on a lot of the
7 pollution activities that have occurred in the earlier

070908a

8 time periods. My staff and I have reviewed the 178 page
9 permit to confirm that all the state and federal
10 requirements have been met.

11 The Title V permit application is supposed to be a
12 one stop shop document that, basically, ties all of the
13 past instruction permits, all of the current Illinois
14 regulations and all of the current operating permits that
15 they have to abide by and all of the standards so that
16 the facility knows what they have to comply with, the
17 agency knows what it has to comply with and the citizens
18 can review that and also determine what the applicable
19 regulations are.

20 The application and draft permit includes limits for
21 the three incinerators there for such things as visible
22 emissions, which you can see coming from the stack where
23 they have a continuous monitor on it. Sulfur dioxide,
24 carbon monoxide, which they also have a continuous
25 monitor for. A continuous monitor is something like

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1 having your speedometer that is tied to a recorder that
2 the police can come in and check what you've been doing
3 for the previous times you've documented. They also have
4 to check for organic emissions or VOCs. That's got a
5 continuous monitor for it. Also, other pollutants that
6 are regulated such as nitrogen oxide, other hazardous
7 pollutions, hydrogen chloride, and then they also have to
8 show that the incinerator can destroy all the waste they
9 put into it with a very high degree of destruction.

10 They have operating permit limits and what those
11 mean is that they have a permit after they do a stack

070908a

12 test that --

13 MS. POPE: Conclude.

14 MR. SCHREIBER: They have to go through and
15 demonstrate how they comply with all those particular
16 limits. The draft permit for Veolia's facility contain
17 the operating constraints and the required emission
18 controls to achieve the minimization of emissions from
19 the hazardous-waste combustors and all associated
20 activities. The draft permit contains provisions to
21 demonstrate and document Veolia's compliance with the
22 permit limits.

23 It is my personal belief the US EPA has done a very
24 thorough job in writing this permit. It meets both the
25 intent and requirements of the MACT standards, the Title

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1 V permitting requirements, and the Clean Air Act outlined
2 by Congress in 1990. Thank you very much.

3 MS. POPE: Dr. Jed Deets.

4 DR. DEETS: Good afternoon. I'm Jed Deets and
5 I thank you for the opportunity to speak today on behalf
6 of Veolia and their Title V Air Permit. A little bit of
7 my background. I have a bachelor of mathematics from
8 SIU, a master's degree in leadership from the University
9 of Hawaii and a doctorate degree of education from SIU
10 Edwardsville.

11 I served as a high school and middle school teacher
12 for seven years, a principal for two years, an elementary
13 superintendent for two years and the regional
14 superintendent of St. Clair County for nine years,

070908a

15 regional superintendent of schools in St. Clair County
16 for five years.

17 And then the reason why I'm here today I had the
18 privilege of serving as the Cahokia unit school
19 superintendent for years 2000 to 2005 for five years, and
20 it was during my tenure -- in fact, my old boss is here,
21 future speaker, former mayor of Cahokia, who hired me in
22 that position. But it was during that tenure as Cahokia
23 superintendent that I had the opportunity to work with
24 Veolia and Mr. Doug Harris.

25 I think back to my very first Chamber of Commerce

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1 meeting when the businesses were invited to meet the new
2 superintendent, and everyone came up to give me their
3 business cards and wanted to tell me what a valuable
4 educational partner they wanted to be, and I carefully
5 filed all those cards away knowing from my vast
6 experience, that when businesses tell you they want to be
7 an educational partner, they really don't want to be a
8 partner. They want -- they want you to do good things in
9 their community, and they want to help out, but I kept
10 that card, and it wasn't a month or two later, the next
11 chamber meeting, or maybe it was even at a Kiwanis
12 meeting, Mr. Harris came up and said, Dr. Deets, we want
13 to be a business partner, an educational partner, what
14 can we do to help your schools.

15 So now that he's asked twice, I began to probe and
16 say, what is it that you can do to help Cahokia School
17 District, and he listed off four or five things, and one
18 of them he mentioned that was very timely was the

070908a

19 disposal of hazardous waste because the State of Illinois
20 has very strict guidelines for schools on the
21 identification of toxic waste and disposal of that. And
22 we were struggling as a school district on how we were
23 going to dispose of that. And he, Mr. Harris, said no
24 problem; we'll have staff members come out and work with
25 your science teachers and other teachers, and within two

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1 weeks all of our toxic waste had been disposed of in a
2 legal manner. That was very helpful to the school
3 district.

4 Other activities that I can think of that were
5 helpful that Veolia provided to the school district
6 included at least four or five times a year at the
7 elementary level, middle-school level and high-school
8 level we asked for career-education speakers to speak to
9 our students about future opportunities in the business
10 world. Veolia was always very cooperative about sending
11 speakers out.

12 It won't be a surprise to you all of our
13 extracurricular activities -- we're constantly asking the
14 area businesses for donations to support our activities.
15 Veolia was one of the most generous sponsors of all those
16 activities, and I can think of a -- I can remember one
17 Christmas when they donated hundreds of pairs of gloves
18 and stocking caps to our needy families and, once again,
19 a good educational partner.

20 Perhaps, the most important contribution came in the
21 form of the Archview Economic Development Corporation

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22 that Mayor Sauget talked about previously. During my
23 first year in the office, myself and Mr. Sauget talked
24 about what can we do to promote economic development and
25 education within the Cahokia school boundaries, and the

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1 idea -- well, the first step was to invite several of the
2 business leaders of the community, and Mr. Harris was
3 quick to respond and accept that invitation.

4 I know Mayor Reed was there as well. I think other
5 mayors were included. I think the mayor of Cahokia at
6 the time was there, and the mayor of Dupo also came, but
7 from that meeting we started the idea of Archview
8 Economic Development with the mutual goals of promoting
9 education and businesses within the Cahokia school
10 boundaries, and that was four or five years ago, and I
11 know that it's been extremely effective to date and --

12 MS. POPE: Conclude.

13 DR. DEETS: -- one of the things, as a school
14 superintendent, that we ask businesses to do, was to
15 provide educational opportunity for high-school graduates
16 because high-school graduates need to know that there's a
17 connection from their schooling to work. And every year
18 Mr. Harris would call the high school and say, we have
19 opportunities for these two to five jobs; will you send
20 us some of your best high-school graduates so that we can
21 employ them in our area, and I can tell you during my
22 tenure at Cahokia that Veolia was one of the most
23 valuable business partners, community members we have,
24 and because of all their support for the school district,
25 I'm here to speak on behalf of their Title V Air Permit.

Page 24

070908a

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1 Thank you.

2 MS. POPE: Next is Brad J. Harriman.

3 MR. HARRIMAN: Present. Good afternoon. My
4 name is Brad Harriman. I'm the Regional Superintendent
5 of Schools for St. Clair County. And I don't want to be
6 redundant in some of the things that Jed touched upon.

7 I'll tell you a little bit about myself first. I've
8 been a life-long resident of St. Clair County. I've been
9 in education in this county for thirty years. Starting
10 my thirtieth year now. I've served as a teacher, a
11 coach, administrator in both private and public schools.
12 I've served the last two years as regional
13 superintendent. I was elected to the position in
14 November of '06. Mine is an elected position that really
15 seeks to serve all of the citizens and the school
16 districts of St. Clair County.

17 Our office is, basically, a compliance arm of the
18 State Board of Education. Not every school district --
19 there's over nine hundred in the State of Illinois. Not
20 every school district can contact the State Board of
21 Education directly so they seek services through the
22 regional office. Anything from compliance of school
23 policies and school codes to laws governing attendance,
24 discipline, things like that.

25 I've only come to know Doug Harris in the last two

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1 years since I took the position as regional
2 superintendent. He introduced himself -- actually, it
3 was Jed that introduced Doug and I, and Doug right away
4 wanted to offer his services personally and any services
5 that his company could offer the school districts of St.
6 Clair County.

7 So I didn't really know what Veolia did at the time,
8 but Doug informed me of not only what they do but who
9 they employ so I'm here more to speak about -- about the
10 character. I don't know much on the industry side of
11 this thing, but I can say that Doug Harris has never
12 turned me down. He's a friend to education in St. Clair
13 County.

14 I've had to make a call -- I had to make a very
15 difficult call to him. In my coaching days you get
16 pretty close to a lot of young men and women, and I had a
17 young man who had really fallen on hard times, and he was
18 homeless. His marriage had fallen apart. His life had
19 fallen apart. He was really struggling and he needed --
20 he needed somebody to help him get on the right track.
21 So one of the phone calls that I made was to Mr. Harris
22 about employment opportunity for the young man, and he's
23 worked very well with me in trying to get this guy back
24 on the right track.

25 So when it comes to character, I have a lot of

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1 respect, and I hold him in very high regard. I have
2 toured the facility. As I said, I don't know much about
3 the industry, but I've toured the facility, and Doug has
4 informed me about the service that his company does

070908a

5 provide. I do know that his company is a vital part of
 6 St. Clair County. I feel that employment at Veolia gives
 7 people an opportunity to earn a decent living wage and
 8 become productive taxpayers, and I certainly appreciate
 9 that. So not only am I here to speak for Veolia and for
 10 Mr. Harris, but I'm also here to thank him. Thank you.

11 MS. POPE: Did we have another speaker, Gen?

12 MS. DAMICO: Dee Reed is in attendance.

13 MS. POPE: Dee Reed.

14 MS. REED: Thank you very much. My name is Dee
 15 Reed, and I am here today to speak on behalf of Veolia
 16 for the permit. I am speaking today as a Cahokia
 17 resident. I'm a life-long resident of Cahokia. I was
 18 born in 1953 so you can do the math. I'm fifty-five
 19 years old, but I come here because I am a former mayor of
 20 the Village of Cahokia. I served as the mayor from 2001
 21 to 2003.

22 Prior to that, I worked at the Cahokia Public
 23 Library District for twenty-four years. So in my
 24 capacity as library employee, I was also a school board
 25 member for Cahokia Unit School District. It was there

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1 that I first heard about Trade Waste Incineration, and
 2 some of you may or may not know that Veolia has had a
 3 number of names over the years. As Trade Waste
 4 Incineration, I just knew that they were doing some
 5 things with the school, but it was only when I got to the
 6 mayor's office, that I truly learned about what Onyx
 7 Environmental then did when I was called upon by Mr. Doug

070908a

8 Harris to come and do a tour of the plant.

9 well, obviously, when you're a new mayor, everyone
10 calls on you to do tours of places. Not. Doug was
11 probably the only one that kept pursuing me and saying, I
12 really want you to come out here and see the plant and
13 see exactly what we're doing here, and I did tour the
14 plant. I not only felt very comfortable that everything
15 was being done to the letter of the law, but I saw the
16 employees, and I became very familiar with a lot of the
17 employees.

18 I'm smiling at Gale Olden right now. Gale not only
19 would call the office on numerous occasions asking what
20 they could do for the Village of Cahokia, what could we
21 do for the schools and for the village, itself, and they
22 were always there for any kind of Kiwanis, any kind of
23 Rotary, any kind of tournament, any kind of event.
24 Always interested in helping children of Cahokia and the
25 families of Cahokia and I saw it over and over again.

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1 I do want to say the main thing I wanted to say
2 today is in the mayor's office you hear a lot from people
3 from all levels. You hear from corporate leaders. You
4 hear from education leaders. You hear from normal
5 people. Normal people, you like that?

6 But what I want to say is you hear a lot of things;
7 that in living in Cahokia near Sauget where there's a
8 tremendous amount of industry, you hear a lot about
9 green -- and I don't mean green issues. Now, today I
10 mean little green people, like what happened way back
11 years ago, and I'm going to be real honest. I lived on

070908a

12 Edwards Street. I played in Dead Creek. My parents,
13 they died young. They died at fifty-two and fifty-seven.
14 why they died, you know, medical issues. I don't know
15 that we can blame any one thing, but back then I want to
16 say that people did things that, perhaps, you wouldn't
17 even think about doing today.

18 Today our IEPA, our different governmental
19 regulations, we just -- we are living in such a good
20 world right now because we have people like Doug Harris
21 and Gale Olden and George Smith and all the people that
22 work at Veolia. I still live in Cahokia. I want to live
23 in Cahokia, but I want you to remember one thing that
24 Doug Harris -- he probably won't even remember he told me
25 this. But when we did that tour of the plant, he said to

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1 me, you know, we are based here in Sauget, Illinois, but
2 there are only two hundred residents that live in Sauget.
3 We truly think of Cahokia as our community, and I want to
4 do anything we can to help the Village of Cahokia.
5 That's the kind of person Doug Harris is. That's the
6 kind of leadership that he leads Veolia Environmental
7 with, and I speak out very strongly for Veolia. I speak
8 out very strongly for Doug Harris, and I appreciate the
9 opportunity to address this group today. Thank you.

10 MS. POPE: Are there any other speakers signed
11 up at this point? No one? Just as a reminder -- just as
12 a reminder, the deadline for all written comments are due
13 July 18th. The deadline for all written comments. If
14 you have written comments, they're due by July 18th.

070908a

15 Okay. You can also go on line and submit comments,
16 and we have that web address on the back of the agenda.
17 So you may go on line and submit comments, and, again,
18 the deadline is July 18th. Is there anyone who would
19 like to give comments at this time? At this time then
20 we'll begin our question-and-answer period. I'll have
21 Genevieve and Charles Hall to come up front.

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23 (Whereupon, a recess was taken.)

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25 MS. POPE: At this time our public hearing will

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1 continue. Speaker Robert J. McCormick can come on up.

2 MR. MCCORMICK: Thank you very much. Again, my
3 name is Rob McCormick. I am the founder and president of
4 Franklin Engineering Group. Franklin Engineering is a
5 professional services company located in the Nashville,
6 Tennessee, area that specializes in applications
7 involving hazardous-waste combustion and air-pollution
8 controls associated with that.

9 I and my colleague, Dennis Knisley, are here today
10 to speak about the particular project that we performed
11 for Veolia that we think has relevance to this
12 proceeding. This project involved human health risk
13 assessment for the facility.

14 Dennis is going to get into details of that. I'd
15 like to start by just giving a bit of introductory
16 information on our company, the type of service we
17 perform and a little background information on the risk-
18 assessment process for those of you who may not be

070908a

19 familiar with it.

20 First of all, myself, I'm a chemical engineer. By
21 way of education, I have a bachelor of science degree
22 from Washington University here in St. Louis. Received
23 that in 1977. So I have thirty years experience. Almost
24 all of it is related to hazardous waste combustion and
25 air-pollution control of those types of sources.

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1 My experience includes design incinerators,
2 operation of incinerators. I once worked for a company
3 similar to, or in the same business, as Veolia. I also
4 have some experience in environmental permitting and
5 performance testing of these types of facilities. My
6 company, Franklin Engineering, specializes in the same
7 areas. In the last ten years, we've worked for about
8 forty incineration facilities nationwide that hold
9 boilers or other type of industrial furnaces that burn
10 hazardous waste.

11 Most of these are chemical manufacturers are
12 disposing of a product that they or waste they generated
13 inhouse. Some of them are US Government facilities for
14 explosive waste. Some of them are commercial
15 incineration facilities such as Veolia.

16 Our services range from design and construction,
17 modification of incineration facilities to preparation of
18 environmental-permit documents, performance-test plans
19 and also risk assessments. And that's what I'm here
20 specifically to talk about today.

21 For those of you who are not familiar with risk

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22 assessments, it is one of two ways in which the emissions
23 performance of hazardous-waste incinerators is assessed
24 and regulated. First way that these emissions are
25 regulated is through emission standards, which are

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1 generally concentration based or percent removal based.
2 Hazardous-waste incinerator emissions were first
3 regulated in this fashion about -- well, in the early
4 1980s through the Resource Conservation Recovery Act or
5 RCRA, as we refer to it in the industry. These emissions
6 are now regulated under the Clean Air Act MACT standards,
7 which are also concentration-based standards. That
8 acronym MACT stands for maximum achievable control
9 technology.

10 As I said before, these are concentration-based
11 emission standards. The particular pollutants that are
12 regulated are dioxin and furans, total hydrocarbons,
13 carbon monoxide, particulate matter, HCL and chlorine gas
14 and various metals including mercury. There is also a
15 percent removal base standard for what are called
16 principal hazardous organic constituents in waste fed.

17 Compliance with all these emission standards must be
18 demonstrated through performance testing under what we
19 called worst-case conditions. That is minimum combustion
20 temperature, maximum waste-feed rates, maximum
21 metals-and-chlorine feed rates, maximum gas-flow rates,
22 et cetera.

23 For example, the current MACT standard for
24 particulate matter emissions is .015 grains per dry
25 standard cubic foot. In order to pass the performance

070908a

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1 test, the incinerator must be able to demonstrate
2 particulate concentrations in the stack gas less than the
3 standard under worst-case operating conditions.

4 All hazardous-waste incinerators, including Veolia,
5 are required to meet these MACT standards. In addition
6 to the concentration-based standards, some incinerators
7 have been asked to perform human health risk assessments
8 under the auspices of the RCRA omnibus authority.

9 This human risk assessment is a complex process that
10 involves characterization of stack emissions, air-
11 dispersion modeling, behavior of deposited pollutants in
12 soil and water, and estimated uptake of constituents by
13 animal and plant life.

14 The ultimate goal is to estimate potential exposure
15 by human beings through a variety of pathways including
16 direct inhalation and ingestion. We've been involved in
17 a number of these projects. At this point I'm going to
18 turn it over to Dennis Knisley to talk about the details
19 of the project we performed for Veolia. Thank you very
20 much for your attention.

21 MS. POPE: This is Dennis R. Knisley.

22 MR. KNISLEY: Good afternoon. I'm a registered
23 professional engineer in the State of Tennessee, and I
24 currently serve as Vice President of Operations for the
25 Franklin Engineering Group, Incorporated. I have a

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38

070908a

1 Master's of Science degree in chemical engineering and
2 have spent the last twenty-three years in various
3 positions related to chemical process and application of
4 environment regulations and industrial sources.

5 US EPA Region 5 performed a Risk Screening that
6 included a number of simplifying assumptions for the
7 Veolia incineration facility dated March 22, 2004. Based
8 on the results of the risk screening, US EPA recommended
9 annual emission limits for mercury, cadmium and chromium
10 that resulted in certain short-term emission limits that
11 were more stringent than the HWC MACT standards.

12 The HWC MACT standards for the other metals were
13 determined protective of human health and environment
14 based on those results. In April 2004, Franklin
15 Engineering undertook the project to conduct a more
16 detailed site specific risk assessment in accordance with
17 the guidelines published in the 1998 HHRAP Guidance
18 Document for Hazardous Waste Combustion Facilities. This
19 was a peer-review draft. That was the prevalent risk
20 assessment methodology in use at the time. Risk
21 assessment report was submitted in September 2004. The
22 document was reviewed by the US EPA Region 5 and Illinois
23 EPA.

24 A revised risk assessment report was submitted in
25 October of the next year, 2005. The final HHRAP guidance

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1 document was also issued by US EPA in September of 2005,
2 and several of the clarifying procedures in that document
3 were used to prepare the October 2005 report.

4 Additionally, there were a number of site-specific

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5 clarifications and modifications related to air-
6 dispersing modeling, risk modeling and other items that
7 were utilized to construct the October 2005 report.

8 The result of the risk assessment, which is where
9 I'll spend the rest of my time talking are expressed in
10 incremental carcinogenic and noncarcinogenic effects from
11 incinerator emissions on individuals that live within the
12 risk-assessment area.

13 The risk-assessment protocol accounts for inhalation
14 pathways, as well as other pathways, including the
15 potential food-chain routes of exposure. The benchmark
16 for evaluating the carcinogenic effects recommended by US
17 EPA is the individual risk associated with exposure to
18 potential carcinogens released from a single facility
19 should not exceed 1 in 100,000. Conduct of the Veolia
20 risk assessment for carcinogenic effects included
21 evaluation of adult and child resident pathways, as well
22 as adult and child recreational fisher pathways.

23 All four of these scenarios resulted in incremental
24 cancer risk less than the benchmark of 1 in 100,000.
25 Additionally, there's a benchmark for evaluating the

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1 non-carcinogenic health effects, and those are a hazard
2 quotient of 1.0. However, for the purposes of evaluating
3 non-carcinogenic health effects from a single
4 incineration facility, US EPA suggested that the
5 calculated hazard quotient should be less than 0.25,
6 which is four times lower. Consistent with the
7 evaluation of the carcinogenic risk, the non-carcinogenic

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8 risk was re-evaluated in four distinct pathways, adult
9 and child resident and adult and child recreational
10 fisher.

11 Segregated hazard indices based on the target organs
12 were developed to evaluate the non-carcinogenic effects.
13 The results presented in the October 2005 Risk Assessment
14 Report indicate that for each combination of constituent
15 and pathway evaluated the hazard quotient was less than
16 the benchmark of 0.25. Therefore, emissions evaluated
17 are not likely to impose adverse effects related to
18 non-carcinogenic hazard.

19 To summarize the discussion of potential health
20 effects associated with emissions from the veolia
21 facility, based on the conservative evaluation described
22 in the October 2005 Risk Assessment Report, the potential
23 health effects, both carcinogenic and non-carcinogenic,
24 are below the benchmarks established by US EPA.

25 Therefore, the HWC MACT standards proposed in the

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1 Title V permit should be protective of human health and
2 environment. Let me conclude with a practical
3 comparison. I drove from Nashville, Tennessee, today to
4 address this meeting. Based on information from the
5 National Traffic -- National Highway Traffic Safety
6 Association, in 2006, there was an 860 in 100,000 chance
7 of being injured in a car accident. Our risk-assessment
8 results indicate that there is less than a 1 in 100,000
9 chance that after thirty years there will be any
10 carcinogenic effects based on the conservative estimate
11 of emissions from the veolia facility. Thank you for

070908a

12 your attention.

13 MS. POPE: Is Karen Yonley here? Come on, Miss
14 Yonley. To remind you, there is no drinking or eating in
15 this room.

16 MS. YONLEY: Good afternoon. My name is Karen
17 Yonley, Y-O-N-L-E-Y. I'm a chemical engineer and a
18 licensed professional engineer, and I was asked to speak
19 by Veolia this afternoon on behalf of the Veolia's risk
20 assessment, as spoken by the last couple of speakers.

21 I'm a principal engineer with Schreiber, Yonley and
22 Associates in West County in St. Louis. We're an
23 environmental engineering firm, and as part of my
24 responsibilities with our firm, I've been involved for
25 over the last twenty years with hazardous waste

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1 combustion facilities, with the permitting and study of
2 the emissions of those facilities.

3 So my experience has included, for example, applying
4 the Clean Air Act regulations and the Resource
5 Conservation Recovery Act regulations, working on permit
6 applications and permit conditions for the hazardous
7 waste-combustion facilities, analyzing emissions, testing
8 results and coordinating and studying the results of
9 multi-pathway risk assessment that, again, that Franklin
10 Engineering speakers were talking about. And that is
11 used as a component of the permitting process.

12 I've been involved with risk-assessment topics for
13 hazardous-waste combustion facilities in EPA's Regions 4,
14 5, 6 and 7, and those include facilities in the states

070908a

15 of: Arkansas, Missouri, Kansas, Indiana, Tennessee,
16 Mississippi, South Carolina and Texas. So I have been
17 involved with a lot of what's been going on in the United
18 States to see the kind of examples of the studies that
19 have been done.

20 So due to my experience in this area, I was asked by
21 Veolia to provide a peer review of the approach and the
22 result of the risk assessment that was prepared for the
23 Veolia incinerators by Franklin Engineering. My comments
24 are based on both our company's involvement in the Title
25 V permitting process that Bob Schreiber spoke about and

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1 that is the subject of this meeting and our review of the
2 risk assessment and the result.

3 A little bit of a repeat, but I wanted to speak a
4 moment again about the purpose of the risk assessment and
5 the permitting process. As also said, the incinerating
6 emissions are regulated in the Title V by the hazardous-
7 waste combustion, which is HWC, MACT regulations and
8 those specified emissions limits for dioxin, metals,
9 carbon monoxide, THC and HCL/C2, and those standards were
10 established by EPA over many years through evaluating the
11 maximum-achievable controls of these types of facilities
12 and then also verifying that these types of emissions
13 were protective through a risk-assessment process on a
14 national basis.

15 Once the standards were established, they were
16 applied to all the hazardous-waste combustion facilities
17 such as Veolia. The Resource Conservation Recovery Act
18 or RCRA permitting process is where the risk assessment

070908a

19 results are actually reviewed and applied. That's a
20 separate and additional permitting process from the Title
21 IV, and the RCRA permitting process includes the
22 requirement for EPA to address protectiveness of the
23 human health and the health of the environment on the
24 site-specific basis for each permit.

25 So the risk-assessment tool can be used and is used

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44

1 to document the facility emissions are protected both on
2 a short and long-term basis. Veolia has prepared a risk
3 assessment, as described by Franklin Engineering, to
4 document that the MACT emissions standards that are in
5 the Title V are protected. Therefore, although it's part
6 of a separate permitting process, the result can also
7 provide some assurance to the Clean Air Act permitting
8 process.

9 From my review, I found that the approach that's
10 used in the risk assessment for Veolia is based on EPA's
11 guidance and methods that are currently being used across
12 the industry for permitting. The EPA methods, as already
13 indicated, are based on very complex methods and
14 guidance. The process allows for a combination of both
15 site specific and default assumptions for the modeling
16 parameters.

17 I found that the Veolia risk assessment follows the
18 guidance and modeling approaches as used across the
19 nation and different information also that's available by
20 EPA for risk assessment, and it does both the default and
21 site-specific assumptions.

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22 As typical, many worst-case assumptions are used in
23 the risk assessment, and, for example, in this one, one,
24 that the use of highest-maximum emissions is used, as
25 opposed to the actual emissions that are seen over the

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1 course of the thirty-year period that it studied.

2 Also, the point of maximum impact that's determined
3 from the air-dispersion modeling is used instead of where
4 people would, actually, reside and have activity. So
5 both of those would act to significantly overstate any
6 potential maximum emission impact.

7 Therefore, that's -- all these conservative
8 assumptions are what helped render the risk assessments
9 to be conservative in nature. In Veolia's case where the
10 site-specific assumptions have been used, the facility
11 gathered data to document the appropriateness and
12 representative of the information.

13 The result of the risk-assessment study that I have
14 reviewed for Veolia document that any potential cancer or
15 non-cancer risk to human health from facility emissions
16 is lower than the acceptable threshold established by EPA
17 as was also mentioned by Franklin. The hazard quotient
18 for non-cancer effect and then any carcinogenic effects
19 is one in a hundred thousand, and the facility is below
20 those benchmarks.

21 Therefore, in conclusion and based on my knowledge
22 of the Veolia incineration facility and hazardous-waste
23 combustion permitting, I believe that Veolia's risk
24 assessment is both representative of the approaches used
25 across the industry, and that the MACT emission limits

070908a

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46

1 that are in the Title IV permit are expected to be
2 protective of human health. Thank you.

3 MS. POPE: Leah Dettmers. What's the name of
4 the first speaker?

5 MS. DAMICO: State Representative Reitz.

6 MS. POPE: State Representative Reitz.

7 MR. REITZ: I'm State Representative Dan Reitz.
8 I serve as state representative for the 116th District,
9 which includes Sauget and Veolia technical Solutia plant.
10 I'd like to start by thanking the US EPA and thank
11 you for the hearing and working with the Illinois EPA on
12 the regulators to assure that the company operates good
13 and proper permits to safely operate in my district.

14 The veolia plant and similar companies I think play
15 an important role in cleaning up our environment and
16 providing a safe place for disposal of hazardous waste.
17 I've had several opportunities to visit the facility.
18 I'm extremely impressed by how professional and
19 conscientious the workers are when I've been on the tour.

20 I'm also aware of the outreach program this plant
21 has with the community, and they work with the local high
22 school and posting career days, and they have been a good
23 employer and putting some of the youth to work as they
24 graduate from high school. They've also established a
25 great working relationship with the emergency planning

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47

070908a

1 committee and the Village of Sauget.

2 Veolia is an integral part of the economy in Sauget
3 and in my district and provides over two hundred jobs
4 through the region. We appreciate the investment they
5 make and the valuable service they provide. There's a
6 need throughout our country to expand these types of
7 facilities. To meet the demands, more products are
8 classified as hazardous waste. Hazardous waste in an
9 effort to provide a safer and cleaner environment for our
10 citizens.

11 Speaking with local elected officials, I'm aware of
12 the hope that future expansion for the Veolia company
13 will be in the Sauget area. This potential expansion
14 would be welcome by our region, and I would offer my
15 assistance in any project that provides any type of
16 economic development.

17 I'd like to thank you, once again, for your work and
18 the EPA to guarantee that we have a safe place to dispose
19 of hazardous waste, and that we have adequate protection
20 from the dangers that improper disposal would have on our
21 area. Thank you.

22 MS. POPE: Leah?

23 MS. DAMICO: Leah is still not in attendance,
24 but Darryl Elbe is here.

25 MS. POPE: Darryl Elbe. Darryl Elbe, would

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48

1 you, please, state your full name, and spell your last
2 name.

3 MR. ELBE: My name is Darryl Elbe, E-L-B-E. I
4 am retired Emergency Management Agency Director for St.

070908a

5 Clair County. Retired in 2006. Served about
6 sixteen years and I just wanted to say this about --
7 well, Trade Waste and then Onyx and now Veolia. That in
8 my years of being Emergency Management Director, we never
9 once had to respond to a spill or a release down there.

10 They've been very good. They've been good to work
11 with while I was there. They're still good to work with.
12 They've -- we've had the opportunity to form a hazmat
13 team, hazardous material team, in St. Clair County. They
14 were a very intricate part.

15 A gentleman by the name of Steve Luthy (phonetic)
16 provided us space to hold our meetings with all the
17 people when we first formed the hazmat team. They were
18 great to work with and I'm sure as a member -- I still
19 serve on the St. Clair Special Emergency Services on
20 their board, which is the hazmat team here in St. Clair
21 County, and I look forward to working with the people
22 from Veolia, and I thank you for your time.

23 MR. FEHER: Good afternoon. My name is Don
24 Feher, retired fire chief from Fairview Fire Department,
25 Fairview Heights, Illinois. I was county fire chief,

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49

1 association president for a period of something over
2 fifteen years. After fifteen I stopped counting. Also,
3 the LEPC chair for the county, local emergency planning
4 committee chairman for St. Clair County and that was well
5 over fifteen years.

6 I was appointed to that position by then County
7 Board Chairman, John Baricevic, and carried on since then

070908a

8 under the current. Mr. Elbe pretty much took some of the
9 thunder away from what I was going to say in that we had
10 a very active, and we do have a very active, LEPC
11 committee.

12 The need for response capability because we don't
13 see a lot of incidents within the site or coming from the
14 industries that are home based here in the county as much
15 as we do by rail and by truck, and it's the ability to
16 have a response capability throughout the county was very
17 important.

18 And the industries some ten years ago worked with us
19 very closely to help establish that organization. Veolia
20 was very much a part of that. It wasn't called that at
21 the time. It was Onyx, and we had mentioned Steve Luthy,
22 and Steve played a very notable part in that. We used
23 their facility for probably about a six-month period with
24 attorneys out of Springfield, from the Attorney General's
25 Office, Illinois EPA, State's Attorney here in St. Clair

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1 County and a couple of attorneys, and also the attorneys
2 from various industries helped structure an organization
3 used in response.

4 Veolia, we used their facility. Ran up their phone
5 bills and all that sort of stuff, and even today the
6 organization exists primarily through donations and
7 stuff, and they did play an integral part.

8 As LEPC chair, I monitored the industries, who have
9 had hazardous materials and stuff within the county, are
10 required by law, by federal statute to report to us, and
11 I monitor that reporting. They've been faithful about

070908a

12 their reporting to us and what they do have so that we
13 can share that with the fire departments and especially
14 the hazmat team, which serves the entire county.

15 They've done an excellent job. I've worked with
16 Mr. Luthy very closely during the formation and got to
17 understand their facets of things and especially the
18 safety. Took me through some of their safety plans
19 through their facility a number of times to show some of
20 the safeguards and stuff in their facility. Look forward
21 to working with them even more and, I guess, that's about
22 all I've got to say at this point in time. Thank you.

23 MS. POPE: Are there any more speakers? Is
24 there anyone that would like to make public comments? Is
25 there anyone who has a question that they need answered?

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51

1 Could you come to the podium, please? This is Carrie
2 Yonley?

3 MS. DETTMERS: No, I'm Leah Dettmers. I do
4 apologize for my tardiness. Upon review of the permit
5 applications submitted by Veolia, I have determined that
6 this project is consistent with the Final Preferred Solid
7 Waste Management Plan for Madison County.

8 Veolia's operation of their incinerator and
9 reclamation department has been beneficial to Madison
10 County and its residents by disposing of waste such as,
11 unused medical waste, latex/oil based paints, and other
12 household hazardous materials. Without the much-needed
13 incinerator, only one of three in the country, residents
14 and departments of Madison County would inevitably be

070908a
15 storing tons of waste in their homes and warehouses,
16 possibly in violation of federal, state and local solid-
17 waste ordinances.

18 In October of 2007, Veolia provided their services
19 and incinerators to dispose of 300 pounds of unused
20 medical waste from 2,000 homes in Madison County pro
21 bono. They have disposed of waste properly in
22 partnership with the following organizations: Madison
23 County Sheriff, Southern Illinois Law Enforcement
24 Commission, SIU-E School of Pharmacy, Madison County
25 Board Office, Madison County Recycling, Madison County

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52

1 Planning and Development, and other numerous municipal
2 departments or law enforcement.

3 Since 2002, Veolia has also partnered with IEPA and
4 Madison County Recycling to fuel blend/reclaim latex and
5 oil-based paints from the public, averaging almost 20,000
6 gallons a year.

7 In conclusion, the operations of Veolia are secure,
8 efficient, and well-maintained. All aspects of safety
9 are top priority for employees, as well as the
10 surrounding areas and environment. As Solid Waste
11 Coordinator for Madison County, it is my professional
12 opinion that Veolia would be considered for the permit
13 for the benefit of Madison County and its residents.
14 Thank you.

15 MS. POPE: Anyone else have a comment at this
16 time? Would you, please, state your name, and spell your
17 last name.

18 MS. LOGAN-SMITH: I'm Kathleen Logan-Smith.
Page 46

070908a

19 I'm the executive director of the Missouri Coalition For
20 Environment. We inhale across the river and breathe the
21 air occasionally from your side. And I just wanted to
22 encourage the EPA to deny this permit today. This
23 facility's history does not suggest that it -- it needs
24 to remain in operation, as it has been operating.

25 The -- while whatever is in the analysis, the risk

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1 analysis and whatever is in the permits might be
2 protective, what's genuinely protective or not protective
3 is how it actually operates on the ground and what's
4 coming out of the stack, what's actually in the air that
5 we breathe.

6 And one of the things that also we need to think
7 about is this facility is not alone. There are a number
8 of facilities in the area that are adding to the burden
9 that we breathe, and so cumulative impact is something
10 that needs to be considered in communities that are low
11 income and minority communities that have already more
12 than their share of environmental hazards that they have
13 to deal with.

14 Particulate matter out of the facility is of
15 particular concern for those of us in the non-attainment
16 area looking for, you know, ever more research that comes
17 out that shows fine particulate matters leads to heart
18 disease and a number of health problems and causes
19 numerous deaths across the region.

20 The other item of concern in our region and to me
21 personally is lead because there is no safe level of

070908a

22 exposure to lead, and lead is one of the items that is
23 emitted from the facility. So the -- when you look at
24 what comes out of the facility and what is added to in
25 the region, we need to be cautious and careful about

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54

1 whether a facility that has an operating history like
2 this one does deserves another permit, and then if we
3 decide to permit such a facility, we need to make sure
4 that it has the compliance schedules in it to maintain
5 compliance and the monitoring in it to allow us to make
6 sure it's happening the way that it should and the
7 enforcement from IEPA that makes sure that it actually
8 delivers on the promises that are made in that permit
9 because it's not the equations that are going to protect
10 your children, and it's not the formulas and the modeling
11 that are going to protect us. It's what's, actually,
12 coming out of the stacks at any given moment. It's how
13 well things are handled there and whether people are --
14 whether the operation is -- is exceeding minimum
15 standards. So we'll submit more detailed comments by
16 writing.

17 MS. POPE: Any more public comments? Do we
18 have any questions that we can answer at this time?

19 MS. ANDRIA: Come on up, Kathy.

20

21 (Whereupon, a recess was taken.)

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23 MS. POPE: Again, remember the deadline for
24 written comments are July 18th. At this time we'll be
25 taking -- maybe we're going to take just a couple

070908a

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1 minutes, just a break, maybe five, just to get some
2 water. Thank you for coming, and we'll start again at
3 ten after.

4

5 (Whereupon, a recess was taken.)

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7 MS. POPE: We will now reconvene. We will now
8 reconvene for our five o'clock public hearing. Good
9 evening, everybody. My name is Janet Pope, and I am a
10 Community Involvement Coordinator with the US
11 Environmental Protection Agency. Tonight I will serve as
12 your hearing officer. We have two other people from the
13 US Environmental Protection Agency with me. We have
14 Genevieve Damico, who is an Environmental Engineer, and
15 Charlie Hall, who is also an Environmental Engineer with
16 the US EPA.

17 Tonight we are to share information, listen to your
18 questions and comments concerning EPA's proposal of a
19 draft-operating permit for Veolia Environmental Services
20 located in Sauget, Illinois.

21 I hope when you came in, you signed in. What that
22 does is puts you on our mailing list, and if there's any
23 information coming up regarding the site, we'll mail that
24 to you.

25 Tonight's hearing will be three parts. First,

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56

070908a

1 Genevieve Damico will provide an overview of the draft
2 permit. Second, we will take your comments for the
3 record; and, third, if time allows, we will have an
4 informal question-and-answer period.

5 Now, with the exception of the informal
6 question-and-answer session, a court reporter to my right
7 will be making a transcript of the entire period with the
8 exception of the question-and-answer session, and that
9 transcript will be on file in our administrative record.
10 You can also call Genevieve if you want a copy of this.

11 All persons wishing to speak tonight, when you
12 signed in, I hope you checked the Do You Plan to Make
13 Comments, there is a yes box, and now Genevieve Damico
14 will give an overview of the draft permit.

15 MS. DAMICO: Good evening; the Veolia
16 Environmental Technical Services from Sauget, Illinois,
17 is a treatment, storage and disposal facility, which
18 accepts offsite waste for further disposal through
19 incineration. Containers and bulk shipments of hazardous
20 and solid wastes are received, analyzed and transferred
21 to temporary storage facilities, processed and
22 incinerated in one of three combustion units.

23 Veolia is located in an area that is attaining all
24 of the national ambient air-quality standards except for
25 the eight-hour ozone and particulate matter less than 2.5

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57

1 micrograms standard.

2 Veolia requires a Title V permit because it is a
3 major source of hazardous air pollutants subject to
4 requirements under Section 112 of the Clean Air Act for

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5 boilers and hazardous-waste combustors.

6 Title V of the Clean Air Act requires, in part, that
7 all major sources subject to standards under Section 112
8 operate in accordance with a permit. Most Title V
9 operating permits are issued by state or local permitting
10 authorities. EPA is issuing this permit because in
11 response to a petition from the Sierra Club and the
12 American Bottom Conservancy, EPA objected to the permit
13 proposed to be issued by the Illinois EPA.

14 Under Title V, when EPA objects to the proposed
15 permit, the state operating -- permitting authority has
16 the opportunity to address EPA's concerns, but if EPA's
17 concerns are not addressed in a timely fashion, then EPA
18 becomes responsible for issuing or denying the permit.
19 In this case, Illinois EPA did not respond to EPA's
20 concerns in a timely manner, and on September 29th, 2006,
21 EPA announced its intent to issue or deny Veolia a
22 federal Title V permit. Veolia submitted its permit
23 application to EPA on May 2nd, 2007. EPA deemed the
24 application administratively complete on June 13th, 2007.

25 Pursuant to a proposed settlement agreement between

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58

1 EPA and the Sierra Club and the American Bottom
2 Conservancy, EPA intends to complete the public comment
3 process by July 18th, 2008, and issue or deny a final
4 permit by September 12th, 2008.

5 Concurrently with this permitting process, EPA has
6 alleged that Veolia is in noncompliance with the Clean
7 Air Act. Nothing in this permit will shield Veolia from

070908a
8 any enforcement action related to past or ongoing
9 violations that we have alleged.

10 EPA has included a compliance schedule in the draft
11 permit that requires Veolia to test all three combustors,
12 to develop operating parameter limits for emissions of
13 mercury, low-volatile metals and semi-volatile metals as
14 required by the hazardous waste combustion MACT. The
15 draft permit requires that Veolia submit the results of
16 this testing and revised operating parameter limits by
17 September 26, 2008.

18 If EPA finds the revised operating parameter limits
19 acceptable, EPA will reopen the permit to propose
20 incorporating the operating parameter limits developed
21 from the required performance test into the final permit
22 and solicit public comments on the incorporation of the
23 operating parameter limits into the permit. In addition,
24 the permit may be reopened at a future time to
25 incorporate additional applicable requirements or

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59

1 compliance schedules.

2 MS. POPE: EPA public participation regulations
3 require EPA to publish a public notice in the local
4 newspaper. The public notice appeared in the East St.
5 Louis Monitor and the Belleville News Democrat, both
6 published on June 5th. In addition, information was
7 mailed to those who attended Illinois EPA public hearing
8 for Veolia and the hearing for Veolia's neighbor,
9 Solutia. Now, we'll begin our public comment period.
10 I'll call the speakers that have called and signed up
11 first, and then I'll call the speakers who have signed up

070908a

12 in the back after that.

13 When you come up, please, say your full name, and
14 spell your last name for our court reporter. If you have
15 written comments and you don't want to speak, would you,
16 please, make sure either myself, Genevieve or Charlie get
17 those comments before you leave.

18 So that everyone who wishes to speak has a chance to
19 do so, please, limit your comments to five minutes. At
20 the five-minute period I will ask you to conclude. You
21 will have an extra minute to conclude with your comments
22 at that time. If you don't have enough time at that
23 time, you can either write and submit written comments of
24 your remaining comments or either you can come back up
25 once the floor is clear. You can come back up and finish

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60

1 your comments. Okay. Remember, when you come up to
2 repeat your name, spell your last name for the court
3 reporter, and we'll begin this comment period at this
4 time.

5 The first person that I'm going to call is Herb
6 Simmons.

7 MR. SIMMONS: Good evening. My name is Herb
8 Simmons, S-I-M-M-O-N-S. First of all, I'd like to thank
9 the EPA for holding this hearing here, bringing the
10 information to light to the public. I've been the mayor
11 of East Carondelet for the past twenty-four years, and I
12 have a good percentage of my residents have been employed
13 by veolia, and over the last couple weeks I've had the
14 opportunity to talk with some of those employees and

070908a

15 their families to find out anything I could about the
16 company, either positive or negative, and I haven't been
17 able to find any negatives.

18 The people that I've talked to have assured me
19 it's a good company to work for. Everybody is happy.
20 Everything for people who have been there for 14, 15,
21 even as high as 20 years that's been employed there. I
22 also wear another hat. I've been in the EMS business for
23 38 years, and, to my knowledge, in all these years and
24 the years that Veolia has been in operation, I have no
25 knowledge of any type of problems, any disasters or

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61

1 anything taking place that we would have been responding
2 to.

3 So I'm here just on behalf of the Village of East
4 Carondelet and the people that Veolia employs there, and
5 I would ask that the permit that they are applying for be
6 given great consideration. There's too many people out
7 of work now. I don't need any other people in my
8 community without a job. Thank you very much.

9 MS. POPE: The next speaker is Sharece Johnson.

10 MS. JOHNSON: Good afternoon. My name is
11 Sharece Johnson, J-O-H-N-S-O-N. I am the Corporate
12 Marketing Communications Supervisor for Kenneth Hall
13 Regional Hospital. A couple years back we held a
14 celebration in honor of National Safety Month, which is
15 in June, where we give a safety festival to the residents
16 of the community. About 300 people came, and at that
17 time Veolia was nice enough to be one of our corporate
18 citizens, and they sponsored the event. About 300 people

070908a

19 came to the event. We were able to raffle off over 30
20 bicycle helmets, a young girl bike, a young boy bike and
21 a teen bicycle. We also had free food and free raffle
22 items for everyone who attended, and we are very, very
23 appreciative of Veolia's support on that date. Thank
24 you.

25 MS. POPE: Is Rhonda Sauget?

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62

1 MS. SAUGET: Yes. Thank you very much and good
2 evening. My name is Rhonda Sauget, and I am the
3 Executive Director of Archview Economic Development
4 Corporation. Archview Economic Development Corporation
5 is a 511C3 organization created about seven years ago
6 with the mission of networking resources to help build a
7 strong fiber for the communities we serve. We represent
8 over 60 businesses, education and health care
9 organizations in Cahokia, Centreville, Alorton, Sauget,
10 Dupo, East Carondelet area. Archview's mission is to
11 provide a strong social, educational and business
12 infrastructure for the underserved communities with some
13 of these communities listing among the poorest
14 communities in the nation by household income.

15 Doug Harris, plant manager of Veolia, formerly Onyx,
16 was a founding member and financial contributor to our
17 organization. Since it's creation, Doug Harris currently
18 serves on our board, and Veolia is a strong supporter of
19 the community activities that we sponsor. His commitment
20 has clearly demonstrated Veolia and his tireless
21 dedication to improving our communities and enhancing the

070908a

22 things that we do in the underserved areas.

23 Veolia's corporate social responsibility goes far
24 beyond what other companies in our area have done over
25 the years. For example, Veolia has participated and

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63

1 contributed significantly to many Archview activities,
2 including our career day. At our career day we have over
3 400 underserved students from Dupon and Cahokia school
4 districts, juniors and seniors that have come for the
5 past four years. Those students learn about why it's
6 important to stay in school, why it's important to
7 graduate and make good grades. Career day also teaches
8 our students about job opportunities in the communities
9 so our kids can have the hope of staying in our community
10 and having a good, wonderful life with their family, and
11 certainly the future of our area can build on that.

12 Veolia has also participated in the Dupon Centennial
13 100th Year Celebration. This celebration helped the area
14 and the village of Dupon really take pride in their
15 community, and this is also one of our underserved areas.
16 As mentioned just a few minutes ago, Veolia sponsored the
17 Kenneth Hall Regional Safety Day event buying bicycles,
18 helmets and sponsoring many safety activities for the
19 children of East St. Louis, and that was a very important
20 event, and it was wonderful for our kids.

21 Our community needs the jobs that Veolia brings to
22 our residents. We need community support that Veolia
23 brings to many of our organizational activities. In
24 short, we need and want Veolia in our community. We
25 applaud Veolia for its outstanding community support

070908a

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64

1 throughout the years, and we strongly support Veolia's US
2 EPA permit application. Thank you very much.

3 MS. POPE: Are there any other speakers signed
4 up in the back, Charlie?

5 MR. HALL: No.

6 MS. POPE: Is there anybody that would like to
7 give a public comment at this time? Is there anybody who
8 has a question that they need answered at this time?
9 Okay. Well, the deadline for written comments are
10 July 18th. You can submit them in writing. You can
11 submit them online, but everything is due by July 18th.
12 The public hearing we're still going. I'm just talking,
13 but I encourage everybody, who wants to comment, to
14 comment, whether it is oral, in writing, fax, on line, I
15 encourage everybody to comment. Any comments? Any
16 questions? Sure, come on up, Kathy.

17 MS. ANDRIA: I'll ask from here.

18

19 (Whereupon, a recess was taken.)

20

21 MS. POPE: Okay. We'll continue with our
22 public hearing. And I'll just state this; that if you
23 have not signed up for a slot on the public comment
24 sheet, this is your last chance to do so. After we
25 finish this public comment period, we will not go back to

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65

070908a

1 the public comment period. We will not go back. We will
2 do the public comment period at this time. We will end
3 with our question-and-answer section. We will not go
4 back to the public comment period. So if you wish to
5 make a public comment, please sign up at this time.

6 Is Frank Bergman here? Our first speaker, Frank
7 Bergman.

8 MR. BERGMAN: I'll keep this brief and to the
9 point, but I'm glad I had the opportunity to come here
10 today to address everyone that's here and speak about my
11 relationship -- our relationship to the Village of
12 Cahokia's relationship -- I'm the mayor of the Village of
13 Cahokia -- with Veolia and formerly Onyx.

14 When I first took over as mayor, I think what we
15 asked for from all of our companies, businesses,
16 corporations that work there is that they work with us,
17 keep us informed, and Veolia being just a little bit
18 outside does cross into our community. So we have had a
19 very good relationship in that they make their business
20 open to all of our other businesses. We open it up so
21 people can see what it is that they do. They communicate
22 with people with what it is that they do, and they inform
23 everybody what they're doing so that we know and that way
24 can prepare for anything that might be presented to us,
25 any situation that could come up.

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1 As corporations go, they are probably one of the, if
2 not the, most cooperative of any in the area. They do
3 that very well. They open their doors to us, and we
4 appreciate that very much. On the economic side of that,

Page 58

070908a

5 not only many of the people that I grew up with are now
6 employees of Veolia -- am I saying that correctly? Just
7 wanted to make sure that's correct. But there's also
8 just a huge impact from them on the economic front from
9 all of our other businesses there from buying goods and
10 services from local vendors to the restaurants to the
11 people that live there -- that live there and pay
12 property taxes and participate in our community. So they
13 are very good partners on that front as well.

14 From the community standpoint of helping with our
15 children, there's any number of things from helping with
16 community baskets in the wintertime for the senior
17 citizens, people who are unable to afford food, various
18 items that they contribute to, as well as to the youth
19 activities and the community, and there's many of them
20 instead of just one or two.

21 So they help with everything from all sorts of
22 activities. So for our community, for us, Veolia has
23 been very good to work with and work for us and our
24 community. Unlike many other businesses, they have been
25 very open and welcoming to anyone to come down and visit

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67

1 and see their site and to keep us informed. Some
2 corporations tend not to do that. They have had an open-
3 door policy with us. They've had an open-door policy
4 with our fire department, our police department, our
5 administration and all of our local businesses.

6 We do not always get that opportunity to work with
7 corporations that way. So from that perspective, Veolia

070908a

8 has been very proactive in supporting our community and
 9 also informing our community of any dangers or any
 10 questions that we may need to get resolved. They are, as
 11 I said, the most proactive in the region that I'm aware
 12 of, as far as making people informed about what it is
 13 that they do and how they do it.

14 So I'm here to support them and their permitting
 15 process. I believe they have a safe and efficient
 16 operation that makes the region stronger for them being
 17 here. So, with that, I think that's all I have to say,
 18 and I'd like to thank everybody for letting me have the
 19 time to talk this evening.

20 MS. POPE: Next speaker will be George Paddock.

21 MR. PADDOCK: I came here initially to observe,
 22 but I think I've been called to speak. Again, George
 23 Paddock, P-A-D-D-O-C-K. Arguing over the sign size and
 24 where it's posted is trivial. If you're coming to inform
 25 or to be informed, you have some responsibilities, one of

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68

1 them is to find your way to the meeting. I have taught
 2 classes to the underprivileged and have taught and made
 3 the privileged experience the trials and tribulations of
 4 the poor. And I have realized we all have
 5 responsibilities, and some of them are to make it to
 6 important hearings such as this.

7 Regarding this hearing, whether the economic impact
 8 is good or bad is not the bottom line here. Whether we
 9 end jobs is not the bottom line. The bottom line is, is
 10 it safe? The city and state speakers missed the point,
 11 some of them. Jobs are not the point. Yes, it is

070908a

12 important that veolia is a good neighbor and that it
13 provides bicycle helmets to children, but the bottom line
14 is, is the plant safe.

15 I am here as a neighbor, resident and concerned
16 individual for my safety and the safety of all the people
17 in this room and in the community. Unsubstantiated
18 innuendo of what is pumped into air must be dismissed as
19 fear mongering and nothing else. Professional opinion
20 with the consequence of lost licensing by engineers and
21 other competent professionals should carry all the burden
22 of proof for compliance.

23 The bottom line is the Veolia plant chooses to not
24 only to meet the government's mandated requirements but
25 to far exceed them.

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69

1 MS. POPE: At this time, I'll repeat this
2 again; if you want to give public comments, you need to
3 do so at this time. We will not be going back to the
4 public comment period. Would you like to make public
5 comment?

6 MS. ANDRIA: Yes.

7 MS. POPE: Come up. State your first name,
8 last name, and spell your last name.

9 MS. ANDRIA: My name is Kathy Andria,
10 K-A-T-H-Y, A-N-D-R-I-A. I'm here representing American
11 Bottom Conservancy and the Sierra Club.

12 I appreciate what the previous speaker said; that,
13 yes, there is a responsibility on the part of people to
14 get to a public hearing, but they have to know about it

070908a

15 and EPA has not properly informed the citizenry -- the
16 people who don't work for Veolia, who don't work for one
17 of the cities, the taxing districts that get money from
18 it. The normal people have not been involved, have not
19 been informed. As Genevieve said earlier, there was a
20 public notice put in two newspapers in the legal section,
21 I assume. I don't remember seeing them, and that was,
22 essentially, all the notice that was sent, other than the
23 letters that they sent to people from some meeting years
24 ago.

25 We identified -- our two organizations identified

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70

1 this as an environmental-justice issue. That is because
2 there is an unburdened -- undue burden on low income and
3 minority people. When there is an environmental-justice
4 issue identified, it is incumbent upon US EPA or Illinois
5 EPA to have enhanced outreach. That's where you go the
6 extra step to let people know that there's a public
7 hearing and what it's about, what it's for, what their
8 abilities are to comment, how they can learn about it. I
9 do -- I asked them -- I asked Genevieve to -- for a
10 written record to be put in libraries so that people
11 could go and look it over and see the issues and read
12 about it because not everyone in this area has access to
13 a computer. They can't or they can go on line, and like
14 some of the people I know, including myself, it's hard to
15 open up all the PDF files because you don't have enough
16 memory, and so it is a chore.

17 In response to my request, she did make -- she
18 denied the request for written. I also asked for a list

070908a

19 of the documents so we could tell what they were, but she
20 denied that also, but they sent out CDs, and she asked me
21 where I wanted the CDs to go, and I sent her a list of
22 libraries with addresses and the area libraries and
23 suggested villages, city clerks, but there was nothing
24 that was sent out to tell people, hey, if you go down,
25 we're having this public hearing. It's about a

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71

1 hazardous-waste incinerator. If you want to know more
2 about it, go to this place, and this information is
3 available. EPA has the money to do that. They have the
4 obligation to do that. They did not do that.

5 From the time of the initial public notice when I
6 asked the question previously to -- to make a formal
7 comment, her answers to my questions were off the record
8 and they were not transcribed, but she said that
9 nothing -- that as far as she knows, there was no
10 enhanced outreach, and that they hadn't sent press
11 releases.

12 Yesterday I sent a media advisory to several of the
13 local newspapers, and there was something in the papers
14 and on a website today. US EPA then sent a media
15 advisory dated today saying the public hearing is
16 tomorrow. I have no idea if anyone was confused about
17 it. I was. I had people calling me, saying, what's
18 going on; we don't understand this.

19 Again, enhanced outreach is really important and
20 environmental-justice issues, and it's important for the
21 public. I mean, the Environmental Protection Agency is

070908a

22 supposed to be protecting the public, not the companies,
23 and the company -- I mean, I think -- I want jobs here.
24 I come from a union family. I respect that we need to
25 treat our hazardous waste. I respect that all of the

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72

1 cities around here have income from all of this, but
2 there are laws that have to be -- they have to be
3 followed, and there's a fairness issue. In this case,
4 there was none.

5 I'm not -- I'm a volunteer. I do not get paid to do
6 this. I have been working in this area for many, many
7 years. I took a Title V training from Genevieve, I don't
8 know how many years ago, to learn how better to be a
9 better citizen, how to read a permit. I don't have an
10 engineering background, which Mr. Harris will tell you
11 that I don't know what I'm talking about when I say that
12 they are out of compliance.

13 Well, I did not come up with that on my own. I read
14 the documents. I read where EPA alleges, EPA files --
15 issued a finding of violation. Now, I don't think that
16 they do that just arbitrarily --

17 MS. POPE: Conclude.

18 MS. ANDRIA: -- do that arbitrarily without --
19 just because they want to. I don't think they issue a
20 notice of violation without having the facts. I believe
21 that the history will show from the filings of the
22 Attorney General's Office and previous filings that they
23 have not been in compliance. If they were not able to be
24 in compliance, there would be in this document a
25 statement of -- of -- a schedule to show them, bring them

070908a

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73

1 into compliance. Those are our issues. If they can be
2 in compliance, then -- then we can't do anything about
3 that, if they're in compliance.

4 But they should never have located a hazardous waste
5 incinerator in the midst of how many hundreds of
6 thousands of people; but, anyway, those are my issues.
7 we will continue to watch this. Yes, you can have lots
8 of people stand up and say what a good guy they are, what
9 a good company they are. How we've looked at them, we
10 have been hired by them to say that they are, that
11 they're doing everything good and there's no problem, but
12 why are the agencies, why is the Attorney General's
13 Office, why is US EPA finding that they're not in
14 compliance. So that -- those are the substance of -- of
15 my comments, and I wouldn't doubt that there are still
16 people walking around trying to find this place, but I
17 think -- I thank you because I have been outspoken on
18 this. I have been treated with respect. No one has done
19 anything, said anything nasty, and I appreciate that
20 because I've been at other hearings where that hasn't
21 been the case, and I have taken a tour of the facility at
22 Doug's invitation and so I do know what it is, and I --
23 I -- you know, I really want this to -- I want all of
24 these issues and all of these companies that are
25 located -- the concentration of chemicals that we have

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74

070908a

1 here in Sauget, in Cahokia, in Granite City and no matter
2 which way the wind blows, we're breathing in chemicals
3 and toxins and our children are suffering for that.
4 Thank you.

5 MS. POPE: The next speaker will be Doug
6 Harris.

7 MR. HARRIS: My name is Doug Harris,
8 H-A-R-R-I-S. I am the General Manager of the Veolia
9 facility in Sauget, Illinois, and I've been the General
10 Manager since July of 1999, when Veolia became the owner
11 and operator of the facility.

12 I'd first like to thank the US EPA, along with their
13 colleagues from the IEPA, for the hard work in drafting
14 this Title V operating permit and their efforts to give
15 the people of the Metro East Community an opportunity to
16 voice their views on our facility.

17 In addition, I'd like to thank the many speakers
18 from our community, our customers, members of the
19 education profession, as well as our local government
20 officials, who've appeared here today to express their
21 views and the contribution of our facility. I was
22 especially impressed with the accomplishments,
23 credentials and qualifications of those people, who speak
24 in favor of our facility.

25 A witness has claimed today that we do not deserve a

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75

1 permit because of alleged violations committed many years
2 ago before Veolia began operating the facility. It is
3 profoundly unfair to disparage our reputation on the
4 basis of alleged violations.

Page 66

070908a

5 Another witness today suggested that the toxic
6 release inventory or TRI reports show excessive emissions
7 of harmful chemicals from our incinerator. These
8 accusations are untrue.

9 As even a brief examination of the 2006 TRI reports
10 for the Metro-East area will show, our incinerator
11 emissions are several orders of magnitude below that of
12 other industries. In fact, Veolia emissions are less
13 than one tenth of one percent of all the TRI emissions
14 from industry in Madison County and St. Clair County.
15 That's one tenth of one percent less than that.

16 A commenter also questioned our lead and particulate
17 emissions. In fact, the emissions of these two
18 constituents are extremely low. Well below the EPA max
19 standards level.

20 Another criticized the risk assessment performed at
21 our facility suggesting that it was not based on actual
22 emissions. In fact, as explained by the experts from
23 Franklin Engineering, the risk assessment was performed
24 using worst-case assumptions for the actual emissions
25 from our stacks.

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76

1 And, finally, the US EPA public notice has stated
2 the claim that the EPA considers us to be out of
3 compliance with the Clean Air Act. We strongly disagree
4 with that claim and have asked for a meeting and have a
5 meeting scheduled to discuss that with them, hoping to
6 convince them that their initial conclusions are
7 incorrect.

070908a

8 As a matter of fact, in 2000 and 2006, we received a
9 notice very similar to this. We sat and met at an
10 informal meeting with the US EPA and have never received
11 a violation. We are very confident that once we sit and
12 meet with them on the current concern, they will find the
13 same and not issue a violation.

14 Our business isn't a glamorous business or an
15 exciting one, but we're proud of the fact that so many
16 companies and organizations, which provide, essentially,
17 guides and service to our community and our nation, many
18 of which improve the quality and standard and duration of
19 all our lives.

20 We heard today from Ms. Isringhausen from Washington
21 University School of Medicine, who spoke about the
22 expertise and professionalism Veolia displays when
23 handling waste generated during the course of research
24 and development at one of our top universities in our
25 country. It is exciting when you're at least a part of

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77

1 all the good things that they do at that university.

2 We heard from a Madison County official, who sends
3 out old, out-of-date, unused prescription medicine, which
4 we have handled for that community. I'm sure we've all
5 heard the recent news reports of the harm that can be
6 done with these prescription medicines when they're
7 flushed down the toilets and enter our waterways.

8 These are just two examples of how we manage
9 hazardous industrial waste safely, properly on the behalf
10 of our customers and our community. Such wastes are an
11 inevitable byproduct of manufacturing the medicines and

070908a

12 chemicals and many thousands of other products used by
13 Americans daily. Veolia is proud to provide the means by
14 which our customers can assure their wastes are managed
15 in a responsible, safe manner.

16 We couldn't do this without the high level of
17 dedication and professionalism of all our employees, who
18 work very hard every day to make this a very safe and
19 compliant facility, and I'd like to recognize all of them
20 publically for their efforts and commitment to our
21 continued success.

22 My family and I have been life-long residents of the
23 Metro-East area, as I suspect many people attending this
24 meeting tonight are. I, therefore, very much appreciate
25 the testimony from the gentleman from Franklin

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78

1 Engineering about how the recent risk assessment has
2 demonstrated that our facility at Veolia imposes no
3 threat to human health or the environment, as well as the
4 comments from the experts of Schreiber, Yonley, who were
5 asked to peer review this document for accuracy.

6 MS. POPE: Conclude.

7 MR. HARRIS: I want to conclude today by
8 repeating an invitation I've often made. Our facility
9 has an open-door policy to the community. We would be
10 pleased to give you a tour of our plant. You don't need
11 to make an appointment. All you need to do is stop by
12 anytime. I'm there most everyday and would enjoy the
13 opportunity to tour anybody through the facility. Thank
14 you for your time this evening.

070908a

15 MS. POPE: That concludes our public comment
16 period. Now, we have about five minutes for a
17 question-and-answer session. If anybody has any
18 questions at this time, you may ask your questions at
19 this time. Kathy?

20

21 (Whereupon, a recess was taken.)

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23 MS. POPE: Any more questions? Questions at
24 all? Well, again, just as a reminder, July 18th is the
25 deadline for written comments. You can go online, send

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79

1 by mail, fax, whatever, but that is the deadline for
2 written comments. I've enjoyed this. You've been a
3 wonderful audience, and we wish you good luck on this
4 issue. Genevieve, anything to say?

5 MS. DAMICO: No. Thank you very much for
6 participating today, and I look forward to all the
7 comments that will be submitted by July 18th.

8 MS. POPE: Thank you for coming.

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REPORTER'S CERTIFICATION

I, Sara E. Tipton, Certified Shorthand Reporter and Notary Public, do hereby certify that the foregoing is a true and correct transcript of the Public Hearing held in my presence in the above-captioned cause, and as same appears from my stenographic notes made during the progress of said proceedings.

Sara E. Tipton, CSR

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070908a